

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED** \_\_\_\_\_  
**CANDICE MCWILLIAMS** : **VIOLATION: 18 U.S.C. § 1341**  
 : **(Mail fraud - 1 Count)**  
 :

**INDICTMENT**

**COUNT ONE**

THE GRAND JURY CHARGES THAT:

1. From in or about March 2002 to on or about May 6, 2002, defendant

CANDICE MCWILLIAMS

and Brandon Shahadi, charged elsewhere, devised and intended to devise a scheme to defraud the Progressive Insurance Company and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme that:

2. In or about March 2002, defendant CANDICE MCWILLIAMS did not want to continue making payments on her 1998 Ford Contour (VIN 1FALP6534WK114536).

3. To escape her payment obligations, defendant CANDICE MCWILLIAMS and Brandon Shahadi gave her vehicle up to a chop shop operator so that the vehicle could be "crushed," or disposed of by being disassembled, or "chopped," and the parts sold.

4. On or about April 3, 2002, defendant CANDICE MCWILLIAMS falsely reported to the Philadelphia Police Department that her 1998 Ford Contour (VIN

1FALP6534WK114536) had been stolen.

5. On or about April 3, 2002, defendant CANDICE MCWILLIAMS, falsely reported to her insurance company, Progressive Insurance Company, that her 1998 Ford Contour (VIN 1FALP6534WK114536) had been stolen.

6. Defendant CANDICE MCWILLIAMS made these false reports to the police and Progressive Insurance Company knowing that it would result in Progressive Insurance Company paying off the loan for the vehicle.

7. Defendant CANDICE MCWILLIAMS and Brandon Shahadi intended to cause a loss of approximately \$5,169.94 to Progressive Insurance Company as a result of her mail fraud scheme.

8. On or about May 6, 2002, at Plymouth Meeting, Pennsylvania, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

CANDICE MCWILLIAMS,

for the purpose of executing the scheme described above and attempting to do so, knowingly caused to be delivered by mail, a check in the amount of \$5,124.20, mailed from Progressive Insurance Company, in Plymouth, Pennsylvania, to Ford Motor Credit in Columbia, Maryland,

which paid off the financing for the 1998 Ford Contour that defendant CANDICE MCWILLIAMS had falsely reported as stolen.

All in violation of Title 18, United States Code, Section 1341.

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
*United States Attorney*